

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

MONIQUE D. EVANS,

Plaintiff,

v.

**FORD MOTOR COMPANY &
FRANK ROGERS,**

Defendants.

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Case No.: 17-cv-00497-NKL

Proposed Scheduling Order

Pursuant to Rule 26(f), a meeting was held between Michael Williams, counsel for Plaintiff, and Megan Rhodes, counsel for Defendants. Based on that meeting, the parties have prepared and submit the following proposed scheduling order:

1. **Pre-Discovery Disclosures.** The parties will exchange by **July 21, 2017** the initial disclosures required by Rule 26(a)(1).

2. **Date for Joinder of Parties/Amendment of Pleadings:** The Parties propose that any motion to join additional parties or to amend the pleadings be filed on or before **September 15, 2017**.

3. **Discovery Plan.** The parties jointly propose the following discovery plan.

A. Discovery will be needed on the following subjects:

1. The parties will conduct discovery on subject matters regarding the claims and allegations in Plaintiff's complaint, Defendants' affirmative defenses, Defendant's policies and procedures, and information related to Plaintiff's alleged damages.

B. All pretrial discovery authorized by the Federal Rules of Civil Procedure shall be completed on or before **January 15, 2018**. This deadline should allow the parties to exchange written discovery, conduct necessary

depositions, and otherwise allow the parties a full opportunity to meaningfully evaluate and discover the claims and defenses in this case.

1. Maximum of 25 interrogatories by each party to any other party in accordance with Rule 33.
2. Maximum of 10 depositions by Plaintiff and 10 by Defendants, unless extended by agreement of the parties. Each deposition shall be limited to 7 hours.
3. Plaintiff shall designate any expert witnesses she intends to call at trial on or before **October 16, 2017**, and Defendants shall designate any expert witnesses they intend to call at trial on or before **November 16, 2017**. This paragraph applies to all witnesses from whom expert opinions will be elicited, regardless of whether the witness was specially retained to provide trial testimony. Each party shall ensure compliance with Rule 26(a)(2)(B) at the time of their expert witness designations.
4. Pursuant to Rule 26(a)(2)(C), if either party designates an expert solely to contradict or rebut evidence identified by the other party, the designation of this expert shall be made within 30 days after the designation of the expert and the filing of the report of the other party.

4. **Other Items.**

- A. The parties do not request a conference with the Court before entry of the scheduling order.
- B. The Parties believe that a stipulated protective order is necessary in this case to protect confidential and sensitive records that may be produced. Defendant shall send a proposed protective order to Plaintiff along with Defendants' initial disclosures by July 21, 2017, in accordance with Local Rule 16.1(f)(7).
- C. All dispositive motions, except those under Rule 12(h)(2) or (3), shall be filed on or before **February 15, 2018**. All motions for summary judgment shall comply with Local Rules 7.1 and 56.1.
- D. Final lists of witnesses and exhibits under Rule 26(a)(3) should be due 30 days before trial.
- E. Parties should have 14 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).
- F. This case is expected to take approximately 3-5 days to try and should be ready for a jury trial in **August 2018**.

- G. The parties discussed issues related to electronically stored information. The parties agree that all electronically stored information shall be produced in an imaged format such as PDF or TIFF.

Respectfully submitted,

WILLIAMS DIRKS DAMERON LLC

/s/ Michael A. Williams

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